



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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To: Chair Silver, Commissioners Brandt, Ortiz, and Wilson

From: Dave Bainbridge, General Counsel, Legal Division
Simon Russell, Counsel, Legal Division

Subject: Adoption of Regulation 18720 Regarding Extension of Annual Form 700 Filing
Deadline For Los Angeles County Filers

Date: March 10, 2025

Executive Summary

Staff is submitting for approval the proposed Regulation 18720¹ regarding the one-time extension of the annual Statement of Economic Interests (Form 700) filing deadline for filers impacted by the recent wildfires in Los Angeles County. The regulation would extend the filing deadline (currently scheduled for April 1, 2025) to June 2, 2025.

The proposed regulation was presented for discussion at the Commission's February 2024 meeting and one comment has been received to date.

Reason for Proposed Regulatory Action

The Commission has identified a need for a one-time extension to this year's annual Form 700 filing deadline (currently set for April 1, 2025) for officials impacted by the recent Los Angeles County wildfires. This action would complement a recent Executive Order issued by the Office of the Governor, which extended the deadline for public officials in Los Angeles County to file assuming office and leaving office Form 700s to June 1, 2025.

Background

Section 87203 of the Political Reform Act ("the Act") requires designated public officials to file a Statement of Economic Interests (Form 700) disclosing the official's investments, interests in real property, and income. Officials must file a Form 700 within 30 days of assuming and leaving office, as well as an annual form. The filing deadline for the assuming and leaving office forms are set by the Legislature via statute (Sections 87202, 87204, and 87302 of the Act). The annual filing deadline is set by the Commission via regulation (Regulations 18723 and 18730) and typically falls on April 1 each year for the majority of filers.²

¹ The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

² Regulation 18723 establishes a March 1 annual deadline for the following offices: Governor, Lieutenant Governor, Attorney General, Insurance Commissioner, Controller, Secretary of State, Treasurer, Superintendent of Public Instruction, members of the Legislature, members of the State Board of Equalization, judges and

Because it is set by regulation, the annual filing deadline can only be extended by amending those regulations or by adopting a new, supplementary regulation tailored to a particular subset of filers and/or a unique emergency situation. The Commission previously made use of such authority to extend the Form 700 filing deadline in response to the COVID-19 pandemic of 2020, when it adopted the previous Regulation 18720 (repealed 2020) extending the annual Form 700 filing deadline by 60 days.

On January 7, 2025, the Governor declared a state of emergency in Los Angeles and Ventura Counties due to the Palisades Fire and windstorm conditions.

On February 4, 2025, the Governor issued Executive Order number N-17-25, which extended by 60 days the filing deadline for public officials in Los Angeles County to file their assuming and/or leaving office Form 700s as required by Sections 87202 and 87204 of the Government Code or associated regulations, or any similar statement required by a Conflict of Interest Code adopted by an agency pursuant to Sections 87300 and 87302 of the Government Code or associated regulations. The Governor's Executive Order did not extend to annual Form 700s; however, the Governor's office had been in communication with FPPC staff and was aware that FPPC staff would be proposing that the Commission extend that deadline under its own regulatory authority.

The purpose of the current proposed Regulation 18720 is to provide a one-time extension to the 2024 Annual Statement of Economic Interests filing deadline currently set for April 1, 2025, for officials impacted by the Los Angeles County wildfires. Specifically, it would extend the deadline for filers whose primary residence, primary work location, or Form 700 filing office is located within Los Angeles County, to June 2, 2025³. This action would complement the recent Executive Order from the Governor, which similarly extended the deadline for public officials in Los Angeles County to file assuming office and leaving office Form 700s.

Proposed Regulation

Staff is presenting proposed Regulation 18720. It states that the annual Form 700 filing deadline for any public official whose primary residence, primary work location, or Form 700 filing office is located within Los Angeles County shall be extended to June 2, 2025.

Summary of Public Comment & Responses

The proposed Regulation was presented to the Commission for discussion at the February 13, 2025, Commission meeting.

The Los Angeles County Board of Supervisors Conflict of Interest/Lobbyist Division (the

commissioners of courts of the judicial branch of government, members of the Public Utilities Commission, members of the State Energy Resources Conservation and Development Commission, members of the Fair Political Practices Commission, members of the California Coastal Commission, members of the High-Speed Rail Authority, members elected to the Board of Administration of the Public Employees' Retirement System, and members elected to the Board of Administration of the Teachers' Retirement Board.

³ Staff proposes June 2 as the filing deadline because June 1 falls on a Sunday.

Form 700 filing officer for Los Angeles County) has expressed support for the Regulation. No other public comment has been received to date.

Education/Outreach Efforts

Commission staff will distribute the Regulation to interested parties by means of the “Newly Adopted, Amended or Repealed Regulations” email list and update the “Newly Adopted, Amended or Repealed Regulations” page on the website. Staff will also distribute the Regulation to all Form 700 filing officers located within Los Angeles County and update the Form 700 Section of the Commission’s website to include a notice of the new deadline for Los Angeles County filers.

Conclusion

The proposed Regulation 18720 would provide needed flexibility to Form 700 filers impacted by the recent wildfires in Los Angeles County.

Staff recommends adoption of the proposed regulations.

Attachments:
Proposed Regulation 18720